

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA

In re:

Pro-Mark Services, Inc.,

Bky. Case No. 24-30167
Chapter 7

Debtor.

Erik A. Ahlgren, as Chapter 7 Trustee
of the Bankruptcy Estate of Pro-Mark Services, Inc.,
as Administrator of the Pro-Mark
Services, Inc. Employee Stock Ownership Plan, and
as Trustee of the Pro-Mark Services, Inc.
Employee Stock Ownership Trust,

Plaintiff,

v.

Adversary No. 24-07014

Connie Berg, Kyle Berg, Connie Berg Revocable
Living Trust, Kyle R. Berg Revocable Living Trust,
Chad DuBois, Mandy Grant, and Miguel Paredes,

Defendants.

**STIPULATED MOTION TO FURTHER EXTEND
RESPONSE DEADLINE TO FACILITATE PENDING SETTLEMENT**

1. Plaintiff Erik A. Ahlgren, as Chapter 7 Trustee of the Bankruptcy Estate of Pro-Mark Services, Inc., as Administrator of the Pro-Mark Services, Inc. Employee Stock Ownership Plan, and as Trustee of the Pro-Mark Services, Inc. Employee Stock Ownership Trust, filed his Second Amended Complaint against the Defendants, including Defendant Chad DuBois, on May 20, 2025 (the “Second Amended Complaint”). [ECF No. 120.]

2. The Court previously extended Defendant DuBois’ deadline to file an answer or other response to the Second Amended Complaint to July 21, 2025, because Plaintiff and Defendant DuBois have reached a tentative settlement of Plaintiff’s claims against Defendant

DuBois, subject to a definitive and final signed settlement agreement and Court approval. [See ECF No. 124.]

3. Plaintiff and Defendant DuBois continue to work in good faith to finalize and document such settlement and seek Court approval thereof. To facilitate those efforts, Plaintiff and Defendant DuBois hereby move the Court, by stipulation, for an order further extending the deadline for Plaintiff to answer or otherwise respond to the Second Amended Complaint to August 1, 2025.

Dated: July 21, 2025

/e/ Peter D. Kieselbach

Michael B. Fisco (*pro hac vice*)
Peter D. Kieselbach (*pro hac vice*)
GREENBURG TRAURIG, LLP
90 South Seventh St., Suite 3500
Minneapolis, MN 55402
(612) 259-9710
fiscom@gtlaw.com
kieselbachp@gtlaw.com

and

Erik A. Ahlgren (ND #09561)
Ahlgren Law Office, PLLC
220 W. Washington Ave., Ste. 105
Fergus Falls, MN 56537
(218) 998-2775
erik@ahlgrenlawoffice.net

Attorneys for Plaintiff

Dated: July 21, 2025

/e/ Maurice B. VerStandig

Maurice B. VerStandig, Esq.
The Dakota Bankruptcy Firm
1630 1st Avenue N
Suite B PMB 24
Fargo, North Dakota 58102-4246
Tel: (701) 394-3215
mac@dakotabankruptcy.com

Attorneys for Defendant Chad DuBois

CERTIFICATE OF SERVICE

The undersigned certifies that on July 21, 2025, the above document was served on all counsel of record via CM/ECF.

/e/ Peter D. Kieselbach

Peter D. Kieselbach